

City	Current	Proposed
Boise, ID	222C, <u>250C</u> , 282C, 286C	222C, <u>274C</u> , 282C, 286C
<i>Caldwell, ID</i>	231C, <u>277C</u> , 296C	231C, <u>278C</u> , 296C
Grangeville, ID	<u>224C3</u>	<u>226C2</u>
Hazelton, ID	<u>232C3</u>	<u>224C3</u>
Iona, ID	----	<u>224C0</u>
Jerome, ID	<u>275C1</u>	<u>276C1</u>
McCall, ID	228C3, 238C3, 252C1, 266C1, <u>275C3</u> , 293C3	<u>224C3</u> , 228C3, 238C3, 252C1, 266C1, 293C3
Melba, ID	----	<u>249C</u>
Salmon, ID	<u>224A</u> , <u>233A</u>	<u>225C0</u> , <u>260C1</u>
Sun Valley, ID	237C1, <u>279C</u> , 298C0	<u>233C0</u> , 237C1, 298C0
West Yellowstone, MT	<u>225C</u>	----
Elko, NV	229C2, 233C1, <u>237C1</u> , <u>248C</u>	229C2, 233C1, <u>237C</u>
Owyhee, NV	----	<u>247C3</u>
Arlington, OR	262C2	262C2, <u>291A</u>
Finley, WA	----	<u>230A</u>
Pasco, WA	<u>229A</u> , 252A, 267C3	252A, 267C3
Walla Walla, WA	<u>227C1</u> , 239C, 246C0, 256C1, 264C3	<u>227C1</u> , 239C, 246C0, 256C1, 264C3

College Creek's counterproposal is presented first with a Methods section that demonstrates the end results and the spectrum changes, and sub changes where needed, required to implement the request. A section entitled Exhibits Explained follows this. It lists each technical exhibit and the data it documents. It also lists any additions, deletions, and modifications entries that should be made by the Commission Staff to the CDBS database when examining this counterproposal.

Methods

- I) **RADD 237C3 Owyhee, NV** College Creek proposes to add channel 247C3 at Owyhee, NV, as that community's first local service. If channel 247C3 is assigned to Owyhee, College Creek hereby expresses an interest in and would file an application for Channel 247C3 at Owyhee and would participate in an auction for that channel. The allotment of channel 247C3 at Owyhee at coordinates N41-55-26, W116-11-16, creates a short space to one facility: a) the un-built Construction Permit for KPHD, channel 248C Elko, NV, of 61.76 kilometers.
- a) **KPHD** To eliminate the short space created by the proposed allotment at Owyhee, College Creek proposes to delete channel 248C at Elko, NV, and allot first adjacent channel 249C to Melba, ID, as that community's first local service at coordinates N42-51-53, W116-28-39. Currently channel 248C at Elko is permitted for use by KPHD, and College Creek requests that its license be modified accordingly. The deletion of channel 248C from Elko creates potential White Area including 200 persons. This area is referred to herein as *potential* White Area since KPHD is an un-built Construction Permit having not yet signed on the air. As such, the general public in this *potential* White Area has not become accustomed to receiving KPHD and does not have any expectation for the service. Nonetheless, College Creek proposes that KRJC 237C1 Elko, NV, upgrade to channel 237C to continue offering this area at least one aural service. The allotment of channel 249C at Melba is short to channel 248C at Elko by 19.60 kilometers. Thus, the community of license change is MX. The allotment of KPHD at Melba is short spaced to one facility: ii) KQFC channel 250C Boise, ID, of 137.34 kilometers.
- i) **KRJC** In order to offer continued first aural service to *potential* White Area upon the deletion of channel 248C from Elko, College Creek proposes to upgrade KRJC from channel 237C1 to channel 237C. Holiday Broadcasting Co of Elko, the KRJC Licensee, requests that its license be modified accordingly. The allotment of channel 237C at Elko is fully spaced to all other authorizations, allotments, and pending proposals.
- ii) **KQFC** Presently, KQFC operates on channel 250C at Boise, ID. To eliminate the short space between the proposed allotment of KPHD channel 249C at Melba and KQFC, College Creek proposes the deletion of channel 250C and the substitution of channel 274C

at the licensed site of KQFC. The instant substitution creates the following short spacings; (1) KSAS channel 277C at Caldwell, ID, is 290.00 kilometers short; (2) the Vacant Allotment on channel 275C3 McCall, ID, is 47.94 kilometers short; and (3) KVMX 275C1 Jerome, ID, is 31.31 kilometers short.

(1) **KSAS** Presently KSAS operates on channel 277C at Caldwell, ID. In order to eliminate the short spacing to channel 274C at Boise for KQFC, College Creek proposes to substitute channel 278C for channel 277C at the licensed facility of KSAS. This creates a short spacing to one facility; (a) KSKI channel 279C at Sun Valley, ID, is short by 103.34 kilometers.

(a) **KSKI** Presently KSKI operates on channel 279C at Sun Valley, ID. In order to eliminate the short spacing to channel 278C at Caldwell for KSAS, College Creek proposes to substitute channel 233C0 for channel 279C at coordinates N43-41-06, W114-22-57 for KSKI. This creates a short spacing to two facilities; (i) the Construction Permit for new FM station with FCC Facility ID #164259 at Salmon, ID, on channel 233C0 is short by 105.08 kilometers; and (ii) KTPD channel 232C3 at Hazelton is short by 57.05 kilometers.

(i) **NEW CP Salmon, ID** Presently the Construction Permit for the new FM station with FCC Facility ID #164259 at Salmon, ID, authorizes the station to operate on channel 233C0. In order to eliminate the short spacing to channel 233C0 at Sun Valley for KSKI, College Creek proposes to substitute channel 260C1 for channel 233C0 at the Salmon facility's currently permitted site. This change is fully spaced to all other authorizations, allotments, and pending proposals. However, in the process of downgrading the facility from channel 233C0 to 260C1, white area is created. In order to continue providing at least one aural service to this area, KSRA-FM at Salmon, ID, will be upgraded.

1. **KSRA-FM** Presently KSRA-FM operates on channel 224A at Salmon, ID. In order to continue providing service to those areas that would lose service upon the downgrade of Facility #164259 from 233C0 to 260C1, College Creek proposes to upgrade KSRA-FM from channel 224A to first adjacent

channel 225C0 at coordinates N45-08-42, W114-00-36. The allotment of channel 225C0 at Salmon is short to channel 224A at Salmon by 140.18 kilometers. Thus, the first adjacent channel change and upgrade is mutually exclusive. This creates a short spacing to one facility: a. KEZQ West Yellowstone, MT on channel 225C is short by 67.91 kilometers.

a. **KEZQ** Presently, KEZQ operates on channel 225C at West Yellowstone, MT. In order to eliminate the short space created by the upgrade of KSRA-FM to channel 225C0 at Salmon, College Creek proposes to delete channel 225C at West Yellowstone, and allot first adjacent channel 224C0 to Iona, ID, as that community's first local service at coordinates N43-57-10, W111-52-18. Currently channel 225C at West Yellowstone is licensed to KEZQ, and Chaparral Broadcasting, Inc, the KEZQ Licensee, requests that its license be modified accordingly. The allotment of channel 224C0 at Iona is short to channel 225C at West Yellowstone by 144.18 kilometers. Thus, the community of license change is mutually exclusive. The allotment of channel 224C0 at Iona is fully spaced to all other authorizations, allotments, and pending proposals.

(ii) **KTPD** Presently KTPD is permitted to operate on channel 232C3 at Hazelton, ID. In order to eliminate the short spacing to channel 233C0 at Sun Valley for KSKI, College Creek proposes to substitute channel 224C3 for channel 232C3 at the permitted site of KTPD. This substitution is fully spaced to all other authorizations, allotments, and pending proposals.

(2) **VAC ALLO 275C3 McCall, ID** Presently, a Vacant Allotment is assigned to McCall, ID, on channel 275C3. In order to eliminate the short spacing to channel 274C at Boise for KQFC, College Creek proposes to substitute channel 224C3 for channel 275C3 at current allotment site. This creates short spacing to one facility: (i) KORT-FM at Grangeville, ID, on channel 224C3, is short spaced by 46.85 kilometers.

- (i) **KORT-FM** Presently, KORT-FM operates on channel 224C3 at Grangeville. To eliminate the short space to the substitution of channel 224C3 for the Vacant Allotment at McCall, College Creek proposes to substitute upgraded channel 226C2 for 224C3 at Grangeville at coordinates N45-59-30, W116-10-30. The allotment of channel 226C2 at Grangeville is short to channel 224C3 at Grangeville by 41.19 kilometers. Thus, the second adjacent channel change and upgrade is mutually exclusive. This creates a short spacing to one facility: 1. KRKL Walla Walla, WA, on channel 227C1 is short by 3.09 kilometers.
1. **KRKL**) Presently KRKL operates on channel 227C1 at Walla Walla. In order to eliminate the short spacing to channel 226C2 at Grangeville for KORT-FM, College Creek proposes to modify the antenna site location of KRKL to coordinates N45-59-28, W118-12-31. This creates a short spacing to one facility: a. KGSG channel 229A at Pasco, WA, is short by 0.61 kilometers.
- a. **KGSG**) Presently, KGSG operates on channel 229A at Pasco, WA. In order to eliminate the short space created by the site modification of KRKL at Walla Walla, College Creek proposes to delete channel 229A at Pasco, and allot first adjacent channel 230A to Finley, WA, as that community's first local service at coordinates N46-04-40, W119-09-49. Currently channel 229A at Pasco is licensed to KGSG, and Gospel Music Broadcasting, Inc, the KGSG Licensee, requests that its license be modified accordingly. The allotment of channel 230A at Finley is short to channel 229A at Pasco by 71.37 kilometers. Thus, the community of license change is mutually exclusive. This creates a short spacing to one facility: a. **the NPRM to add channel 231C3 to Boardman, OR, is short by 26.88 kilometers. This is the Counterproposal's MX Point to the NPRM in MB Docket 06-72.**
- i. **NPRM RADD 231C3 Boardman, OR**) College Creek has conducted an extensive search of alternate channels available at Boardman, OR. Unfortunately, no channels are currently available

that provide city-grade service to Boardman. Not only did the Boardman proposed allotment provide first local service to Boardman, it also proposed first aural service to 30 people residing in White Area and second aural service to 683 persons residing in Grey Area to the west of Boardman. Although a channel could not be found to be licensed directly to Boardman, channel 291A can be allocated to nearby Arlington, OR, and still provide first aural service to those 30 persons who would have otherwise been served for the first time by channel 231C3 at Boardman. The allotment of 291A at Arlington also provides second aural service to all 683 persons that would have received their second aural service with Boardman as well as an additional 88 people (a total of 771 persons with second aural service).

-1- **RADD 291A Arlington, OR** In order to still provide first aural service to residents living in White Area and second aural service to residents living in the Grey Area to the west of Boardman, OR, channel 291A is proposed to be added at Arlington, OR. This allotment is fully spaced to all other authorizations and allotments. If channel 291A is assigned to Arlington, College Creek hereby expresses an interest in and would file an application for Channel 291A at Arlington and would participate in an auction for that channel.

(3) **KMVX** Presently KMVX operates on channel 275C1 at Jerome, ID. In order to eliminate the short spacing to channel 274C at Boise for KQFC, College Creek proposes to substitute channel 276C1 for channel 275C1 at the licensed facility of KMVX. This substitution is fully spaced to all other authorizations, allotments, and pending proposals.

Exhibits Explained and CDBS Entries:

Channel 247C3 Owyhee, NV

Exhibit E, Figure 1 is an allocation study showing the spacings to other stations if channel 247C3 is allocated to Owyhee, NV, as that community's first local aural service. The only short spacing shown is the Construction Permit for KPHD, channel 248C in Elko, NV. Exhibit E, Figure 2 shows the proposed city-grade contour for channel 247C3 from the proposed site. The city-grade contour easily covers 100% of Owyhee, NV. Exhibit E, Figure 3 is a gain area study that demonstrates the proposed areas that channel 247C3 will cover as a result of the proposed allocation. It should be noted that first aural service shall be provided to 1,421 persons as a result of this allocation as White Area will be eliminated to a substantial region of north-central Nevada. First Local Service will also be provided to the 1,017 residents of Owyhee.

CDBS Entry:

RADD	247C3	Owyhee, NV	N41-55-26	W116-11-16
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Channel 249C Melba, ID

In order to allocate channel 247C3 at Owyhee, the short spacing with channel 248C (KPHD) in Elko, NV, must be eliminated. Exhibit E, Figure 4 is an allocation study showing spacings to other stations if channel 248C is deleted from Elko and first adjacent, mutually exclusive channel 249C is reallocated to Melba, ID, as that community's first local service. The only short spacing shown is KQFC, channel 250C in Boise, ID. Exhibit E, Figure 5 shows the proposed city-grade contour for channel 249C from the proposed site. The city-grade contour easily covers 100% of Melba, ID. Exhibit E, Figure 6 is a gain/loss study that demonstrates the proposed areas that channel 249C will cover and 248C will no longer cover as a result of the proposed relocation. Exhibit E, Figure 7 is a remaining services study showing no white or grey area will be created as a result of the relocation since College Creek is also instantly proposing to upgrade KRJC Elko, NV, from channel 237C1 to 237C (see below).

CDBS Entries:

RDEL	248C	Elko, NV	N40-55-43	W115-50-33
RADD	249C	Melba, ID	N42-51-53	W116-28-39

Channel 237C Elko, NV

In order to continue providing service to those areas that would lose potential first aural service upon the deletion KPHD channel 248C at Elko, College Creek proposes to upgrade KRJC Elko, NV, from channel 237C1 to 237C at its current site. Exhibit E, Figure 8 is an allocation study showing spacings to other stations if channel KRJC is upgraded from 237C1 to 237C at Elko, NV, at its current site. This upgrade is fully spaced to all other authorizations, allotments, and pending proposals. Exhibit E, Figure 9 shows the proposed city-grade contour for channel 237C from the proposed site. The city-grade contour easily covers 100% of Elko.

CDBS Entries:

RDEL	237C1	Elko, NV	N40-54-35	W115-49-05
RADD	237C	Elko, NV	N40-54-35	W115-49-05

Channel 274C Boise, ID

In order to allocate channel 249C at Melba for KPHD, the short spacing with channel 250C (KQFC) in Boise, ID, must be eliminated. In order to eliminate this short spacing, it is proposed to substitute channel 274C for channel 250C at Boise with no site change needed. Exhibit E, Figure 10 is an allocation study showing the proposed short spacing three facilities: KSAS channel 277C Caldwell, ID; a Vacant Allotment on channel 275C3 at McCall, ID; and KMOV channel 275C1 in Jerome, ID. Since the channel change is occurring at the currently licensed site and there is no change in class, no community coverage exhibit is included.

CDBS Entries:

RDEL	250C	Boise, ID	N43-45-21	W116-05-54
RADD	274C	Boise, ID	N43-45-21	W116-05-54

Channel 278C Caldwell, ID

In order to allocate channel 274C to Boise for KQFC, the short spacing with channel 277C (KSAS) in Caldwell, ID, must be eliminated. In order to eliminate this short spacing, it is proposed to substitute channel 278C for channel 277C at Caldwell with no site change needed. Exhibit E, Figure 11 is an allocation study showing the proposed short spacing one facility: KSKI 279C Sun Valley, ID. Since the channel change is occurring at the currently licensed site and there is no change in class, no community coverage exhibit is included.

CDBS Entries:

RDEL	277C	Caldwell, ID	N43-45-21	W116-05-54
RADD	278C	Caldwell, ID	N43-45-21	W116-05-54

Channel 233C0 Sun Valley, ID

In order to allocate channel 278C at Caldwell for KSAS, the short spacing with channel 279C (KSKI) in Sun Valley, ID, must be eliminated. In order to eliminate this short spacing, it is proposed to substitute channel 233C0 for channel 279C at Sun Valley at coordinates N43-41-06, W114-22-57. Exhibit E, Figure 12 is an allocation study showing the proposed short spacing two facilities: (1) the New CP for FCC Facility ID #164259 in Salmon, ID; and (2) the Construction Permit for new station KTPD 232C3 in Hazelton, ID. Exhibit E, Figure 13 shows the proposed city-grade contour for channel 233C0 from the proposed site. The city-grade contour easily covers 100% of Sun Valley, ID. Exhibit E, Figure 14 is a gain/loss study that demonstrates the proposed areas that channel 233C0 will cover and 279C will no longer cover as a result of the proposed relocation. Exhibit E, Figure 15 is a remaining services study showing no white or grey area will be created as a result of the relocation, channel change, and downgrade of KSKI from 279C to 233C0.

CDBS Entries:

RDEL	279C	Sun Valley, ID	N43-38-36	W114-23-49
RADD	233C0	Sun Valley, ID	N43-41-06	W114-22-57

Channel 260C1 Salmon, ID

In order to allocate channel 233C0 at Sun Valley, the short spacing with the Construction Permit of New FCC Facility #164259 on channel 233C0 at Salmon, ID, must be eliminated. In order to alleviate *this short spacing, it is proposed to substitute channel 260C1 for 233C0 at Salmon at the currently permitted site.* Exhibit E, Figure 16 is an allocation study showing the proposed change is fully spaced to all other authorizations, allotments, and pending proposals. Exhibit E, Figure 17 shows the proposed city-grade contour for channel 260C1 from the proposed site. The city-grade contour easily covers 100% of Salmon, ID. Exhibit E, Figure 18 is a gain/loss study that demonstrates the proposed areas that channel 260C1 will cover and 233C0 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 19 is a remaining services study showing the services that will continue to serve the loss area after the facility is downgraded from 233C0 to 260C1. It should be noted that no white area will be created since KSRA-FM instantly proposes to upgrade to channel 225C0 to cover this loss area.

CDBS Entries:

RDEL	233C0	Salmon, ID	N45-08-42	W114-00-36
RADD	260C1	Salmon, ID	N45-08-42	W114-00-36

Channel 225C0 Salmon, ID

In order to continue providing service to those areas that would lose service upon the downgrade of Facility #164259 at Salmon from 233C0 to 260A, College Creek proposes to upgrade channel KSRA-FM from channel 224A to first adjacent channel 225C0 at coordinates N45-08-42, W114-00-36. Exhibit E, Figure 20 is an allocation study showing the proposed short spacing one other facility: KEZQ 225C West Yellowstone, MT. Exhibit E, Figure 21 shows the proposed city-grade contour for channel 225C0 from the proposed site. The city-grade contour easily covers 100% of Salmon, ID. It should be noted that the proposed site for KSRA-FM on 225C0 is also the currently permitted site for Facility #164259 also licensed to Salmon as a C0. This, the service area of KSRA-FM will completely cover the existing, potential service area of Facility #164259. Exhibit E, Figure 22 is a gain/loss study that demonstrates the proposed areas that channel 225C0 will cover and 224A will no longer cover as a result of the proposed relocation, channel change, and upgrade.

CDBS Entries:

RDEL	224A	Salmon, ID	N45-11-02	W113-52-12
RADD	225C0	Salmon, ID	N45-08-42	W114-00-36

Channel 224C0 Iona, ID

In order to upgrade KSRA-FM to channel 225C0 at Salmon, the shortspacing to KEZQ 225C at West Yellowstone, MT, must be eliminated. Exhibit E, Figure 23 is an allocation study showing spacings to other stations if channel 225C is deleted from West Yellowstone and first adjacent, mutually exclusive channel 224C0 is reallocated to Iona, ID, as that community's first local aural service. The allocation shows that the proposed change is fully spaced to all other authorizations, allotments, and pending proposals. Exhibit E, Figure 24 shows the proposed city-grade contour for channel 224C0 from the proposed site. The city-grade contour easily covers 100% of Iona, ID. Exhibit E, Figure 25 is a gain/loss study that demonstrates the proposed areas that channel 224C0 will cover and 225C will no longer cover as a result of the proposed relocation. Exhibit E, Figure 26 is a remaining services study showing no white area will be created as a result of the relocation since the Class C co-located facilities of KWYS Island Park, ID, will continue to provide coverage to the entire current KEZQ service area. However, it should be noted that grey area will be created containing 1,498 persons.

CDBS Entries:

RDEL	225C	West Yellowstone, MT	N44-33-41	W111-26-32
RADD	224C0	Iona, ID	N43-57-10	W111-52-18

Channel 266C3 Hazelton, ID

In order to allocate channel 233C0 at Sun Valley for KSKI, the short spacing with the Construction Permit for channel 232C3 (KTPD) in Hazelton, ID, must be eliminated. In order to eliminate this short spacing, it is proposed to substitute channel 224C3 for channel 232C3 at Hazelton with no site change needed. Exhibit E, Figure 27 is an allocation study showing the proposed change is fully spaced to all other authorizations, allotments, and pending proposals. Note, since the proposal requests a channel change of equivalent class (Class C3) at the permitted KTPD site, a contour map demonstrating community coverage is not required.

CDBS Entries:

RDEL	232C3	Hazelton, ID	N42-43-54	W114-25-04
RADD	224C3	Hazelton, ID	N42-43-54	W114-25-04

Channel 224C3 McCall, ID

In order to allocate channel 274C at Boise for KQFC, the short spacing with the Vacant Allotment on channel 275C3 at McCall, ID, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 224C3 for channel 275C3 at McCall with no site change needed.

Exhibit E, Figure 28 is an allocation study showing the proposed shortspacing one facility: (1) KORT-FM 224C3 Grangeville, ID.

CDBS Entries:

RDEL	275C3	McCall, ID	N44-54-30, W116-06-00
RADD	224C3	McCall, ID	N44-54-30, W116-06-00

Channel 226C2 Grangeville, ID

In order to eliminate the short space to the substitution of channel 224C3 for the Vacant Allotment at McCall, College Creek proposes to substitute upgraded second adjacent channel 226C2 for 224C3 at Grangeville (KORT-FM) at coordinates N45-59-30, W116-10-30. Exhibit E, Figure 29 is an allocation study showing the proposed short spacing one facility: (1) KRKL 227C1 Walla Walla, WA. Exhibit E, Figure 30 shows the proposed city-grade contour for channel 226C2 from the proposed site. The city-grade contour easily covers 100% of Grangeville, ID. Exhibit E, Figure 31 is a gain/loss study that demonstrates the proposed areas that channel 226C2 will cover and the areas 224C3 will no longer cover as a result of the proposed relocation, channel change, and upgrade. As shown in the gain/loss study, some loss area, despite the upgrade in class, will be created. Therefore, Exhibit E, Figure 32 is a remaining services study showing the services that will continue to serve the loss area after channel 224C3 is changed to 226C2 at Grangeville. As can be seen in the Remaining Services Study, the loss area does not retain any services. However, no population resides in the loss area as it is located in the Nez Perce National Forest and Gospel Hump Wilderness Area. Also, no major roads traverse the loss area. Therefore, the removal of service is permitted.

CDBS Entries:

RDEL	224C3	Grangeville, ID	N45-51-48	W116-07-24
RADD	226C2	Grangeville, ID	N45-59-30	W116-10-30

Channel 227C1 Walla Walla, WA

In order to allocate channel 226C2 at Grangeville for KORT-FM, the short spacing with KRKL on channel 227C1 at Walla Walla, must be eliminated. In order to eliminate this short spacing, it is *proposed to modify the antenna site coordinates of KRKL to N45-59-28, W118-12-31. Exhibit E*, Figure 33 is an allocation study showing the proposed shortspacing one facility: (1) KGSG 229A Pasco, WA. Exhibit E, Figure 34 shows the proposed city-grade contour for channel 227C1 from the proposed site. The city-grade contour easily covers 100% of Walla Walla. Exhibit E, Figure 35 is a gain/loss study that demonstrates the proposed areas that channel 227C1 will cover and the areas 227C1 will no longer cover as a result of the proposed relocation. As indicated by the gain loss study, some loss area will be created. Therefore, Exhibit E, Figure 36 is a remaining services study showing the many services that will continue to serve the loss area after the proposed relocation.

CDBS Entries:

RDEL	227C1	Walla Walla, WA	N45-59-19	W118-10-28
RADD	227C1	Walla Walla, WA	N45-59-28	W118-12-31

Channel 230A Finley, WA

In order to relocate KRKL to its proposed site at Walla Walla, the shortspacing to KGSG 229A at Pasco, WA, must be eliminated. Exhibit E, Figure 37 is an allocation study showing spacings to other stations if channel 229A is deleted from Pasco and first adjacent, mutually exclusive channel 230A is reallocated to Finley, WA, as that community's first local aural service. **The allocation study shows that the proposed change is shortspaced to one pending proposal: (1) the NPRM to add channel 231C3 at Boardman, OR. This is point at which the instant counter proposal becomes mutually exclusive with the petition for rulemaking in MB Docket 06-72.** Exhibit E, Figure 38 shows the proposed city-grade contour for channel 230A from the proposed site. The city-grade contour easily covers 100% of Finley, WA. Exhibit E, Figure 39 is a gain/loss study that demonstrates the proposed areas that channel 230A will cover and 229A will no longer cover as a result of the proposed relocation. Exhibit E, Figure 40 is a remaining services study showing that the loss area will continue to be well served.

CDBS Entries:

RDEL	229A	Pasco, WA	N46-04-59, W119-09-38
RADD	230A	Finley, WA	N46-04-40, W119-09-49

Channel 291A Arlington, OR

In order to still provide first aural service to residents living in White Area and Second Aural service to those in Grey Area to the west of Boardman, OR, channel 291A is proposed to be added at Arlington.

These residence would have, otherwise, received new service from the Boardman, OR, facility on 237C3 if that facility were not in conflict with the instant counterproposal. Exhibit E, Figure 41 is an allocation study showing the proposed addition is fully spaced to all other authorizations, allotments, and pending proposals. Exhibit E, Figure 42 shows the proposed city-grade contour for channel 291A from the proposed site. The city-grade contour easily covers 100% of Arlington, OR. Exhibit E, Figure 43 is a gain/loss study that demonstrates the proposed areas that channel 291A will cover as a result of the proposed addition.

CDBS Entry:

RADD	291A	Arlington, OR	N45-45-57	W120-14-08
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Channel 276C1 Jerome, ID

In order to allocate channel 274C at Boise for KQFC, the short spacing with channel 275C1 (KMVX) in Jerome, ID, must be eliminated. In order to eliminate this short spacing, it is proposed to substitute channel 276C1 for channel 275C1 at Jerome with no site change needed. Exhibit E, Figure 44 is an allocation study showing the proposed change is fully spaced to all other authorizations, allotments, and pending proposals.

CDBS Entries:

RDEL	275C1	Jerome, ID	N42-43-54	W114-25-04
RADD	276C1	Jerome, ID	N42-43-54	W114-25-04

Conclusion

College Creek's counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal creates first aural reception service to 1,697 persons under Priority 1 of the Commission's allotment priorities and second aural service to 2,932 persons under Priority 2. It also provides first local services at Owyhee, NV (population 1,017), Melba, ID (population 439), Iona, ID (population 1,201) and Finley, WA (Population 5,770) under

Priority 3. The counterproposal has the added benefit of increasing the total population served with new FM service by 514,680 persons across an additional 46,624 square kilometers of area under Priority 4.

By comparison, the addition of channel 231C3 at Boardman creates first aural reception service to 30 persons. This number of persons is considered de minimis and would not qualify for Priority 1 treatment. The Boardman allocation would also create second aural service for 683 persons under Priority 2 compared to 2,827 persons receiving second aural service as a result of the College Creek counterproposal. Finally, the addition of 231C3 at Boardman would provide a community of 2,855 persons with its first local service under Priority 3 while College Creek's proposal provides four communities with a combined population of 8,427 persons with their first local service. College Creek's counterproposal is, thus, preferred under each of the Commission's allotment priorities.

Statement of the Engineer

The instant engineering portion of a counterproposal was prepared by College Creek and supports a counterproposal to MB Docket 06-72. It was developed by College Creek and may not be used for purposes other than submission to the Commission by College Creek. It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of College Creek.

For College Creek Broadcasting, Inc.:

A handwritten signature in black ink, appearing to read 'Kevin Terry', written over a horizontal line.

Kevin Terry
May 21, 2006

2835 E 3300 S
Salt Lake City, UT 84109

Cumulative Gain/Loss Study

RADD 247C3 Owyhee, NV

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	0	1,428	1,428	1,421	0	1,017
Land Area (Sq. km)	0	4,803	4,803			

KRJC 237C Elko, NV

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	0	2,680	2,680	72	543	0
Land Area (Sq. km)	0	10,051	10,051			

KPHD 249C Melba, ID

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	37,985	422,953	384,968	12	99	439
Land Area (Sq. km)	23,267	26,478	3,211			

KSKI 233C0 Sun Valley, ID

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	5,710	88	-5,622	0	86	0
Land Area (Sq. km)	1,169	493	-676			

New CP 260C1 Salmon, ID

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	2,778	0	-2,778	0	0	0
Land Area (Sq. km)	5,432	0	-5,432			

KSRA-FM 225C0 Salmon, ID

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	0	5,071	5,071	0	0	0
Land Area (Sq. km)	0	19,336	19,336			

KEZQ 224C0 Iona, ID

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	7,249	120,900	113,651	0	-1,498	1,201
Land Area (Sq. km)	1,533	10,595	9,062			

KORT-FM 226C2 Grangeville, ID

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	0	6,885	6,885	162	2,931	0
Land Area (Sq. km)	49	3,803	3,754			

KRKL 227C1 Walla Walla, WA

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	1,117	6,292	5,175	0	0	0
Land Area (Sq. km)	383	383	0			

KGSG 230A Finley, WA

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	798	2,772	1,974	0	0	5,770
Land Area (Sq. km)	35	35	0			

RADD 291A Arlington, OR

	Loss Area	Gain Area	Net Change	1st Aural	2nd Aural	1st Local
Population	0	1,248	1,248	30	771	524
Land Area (Sq. km)	0	2,515	2,515			

		New Service	1st Aural	2nd Aural	1st Local
NET GAIN	POPULATION	514,680	1,697	2,932	8,951
NET GAIN	LAND AREA	46,624			

Exhibit E, Figure 1

ADD Channel 247C3 Owyhee, NV Allocation Study

REFERENCE

41 55 26 N
116 11 16 W

CLASS = C3
Current Spacings

DISPLAY DATES
DATA 05-18-06
SEARCH 05-18-06

----- Channel 247 - 97.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin

KPHD	CP 248C	Elko	NV 114.24	165.3	176.0	-61.76
Of No Concern: Permitted site of KPHD before deletion of channel 248C at Elko and subsequent allotment of channel 249C at Melba, ID (see below)						
KPHD	PRO 249C	MELBA	ID 107.19	347.3	96.0	11.19
Of Note: Proposed modified community of license and MX channel for KPHD at Melba on 249C at coordinates N42-51-53, W116-28-39						
KHIX	LIC 244C	Carlin	NV 114.84	165.7	96.0	18.84
KHIX.C	CP 244C1	Carlin	NV 114.84	165.7	76.0	38.84

Exhibit E, Figure 2

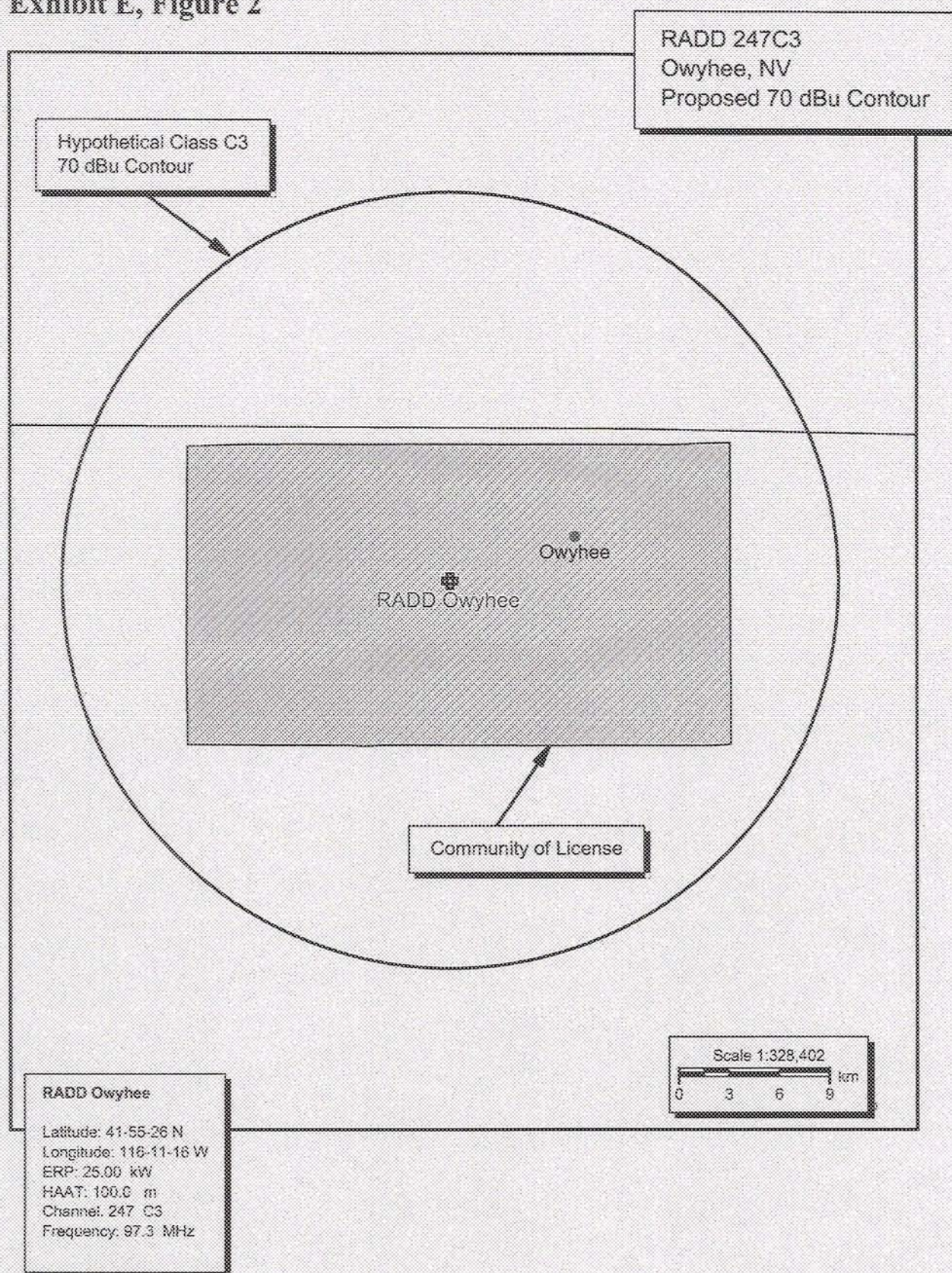


Exhibit E, Figure 3

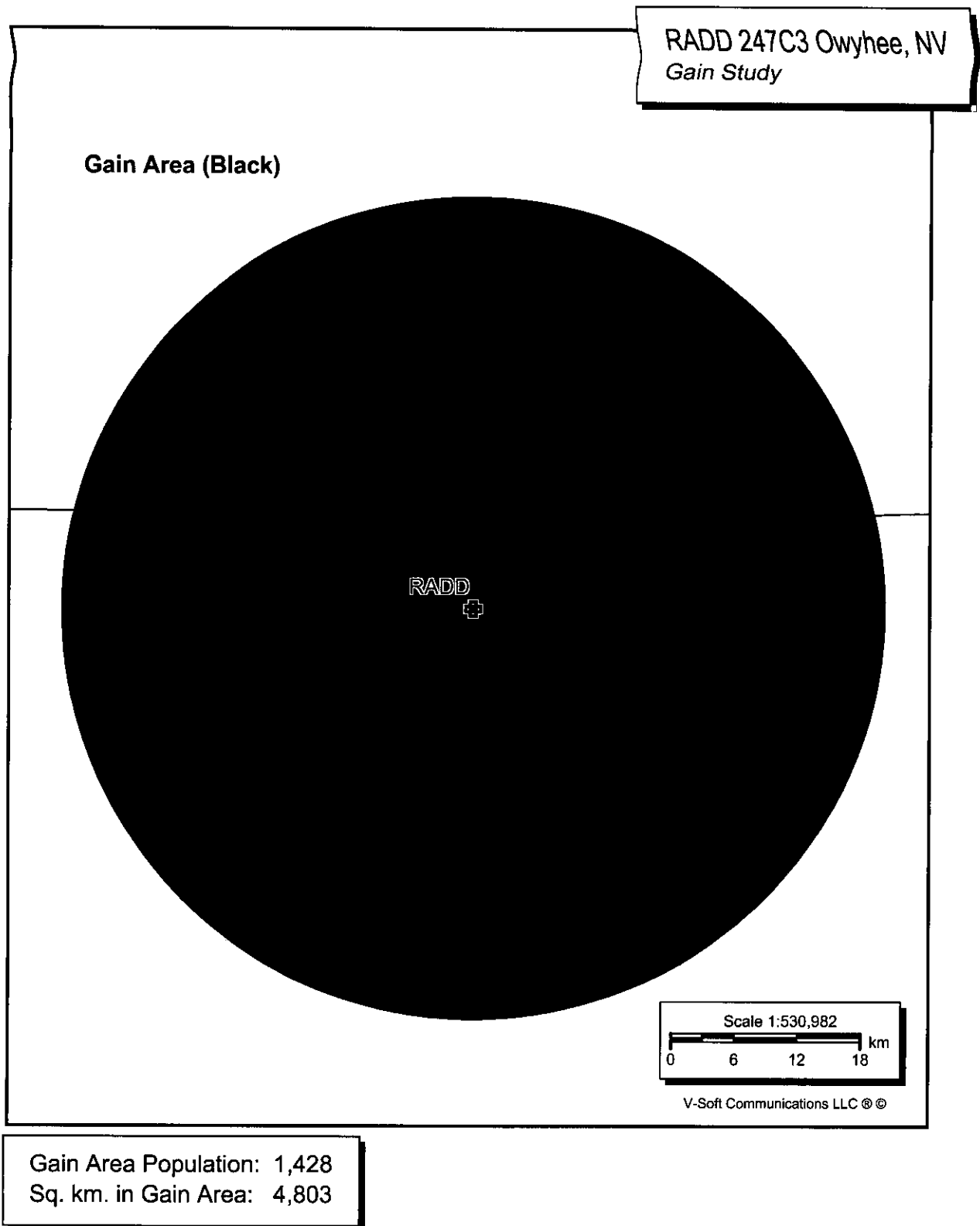


Exhibit E, Figure 4

KPHD 249C Melba, ID

Allocation Study

REFERENCE

42 51 53 N

CLASS = C

DISPLAY DATES

DATA 05-18-06

116 28 39 W

Current Spacings

SEARCH 05-21-06

----- Channel 249 - 97.7 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
KQFC	LIC 250C	Boise	ID 103.66	17.1	241.0	-137.34
Of Concern: Substitution of channel 274C proposed at KQFC site.						
KPHD	CP 248C	Elko	NV 221.40	166.1	241.0	-19.60
Of No Concern: Permitted site of KPHD before proposed modification.						
RADD	PRO 247C3	OWYHEE	NV 107.19	167.1	96.0	11.19
Of Note: Proposed addition of channel 247C3 at Owyhee.						
KSNQ	LIC 252C1	Twin Falls	ID 169.55	94.4	105.0	64.55
RADD	ADD 247C1	Weiser	ID 172.37	342.8	105.0	67.37

Exhibit E, Figure 5

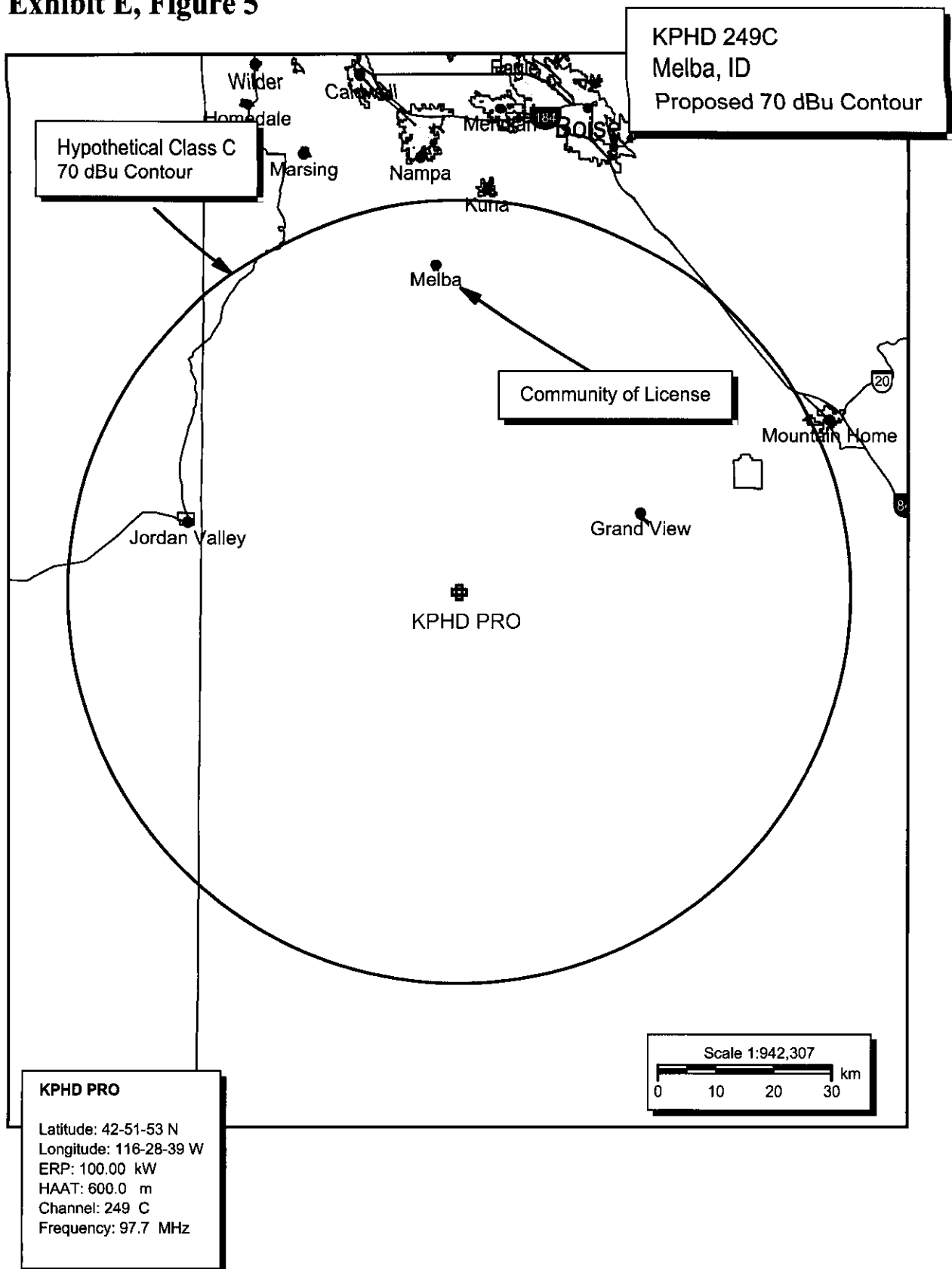
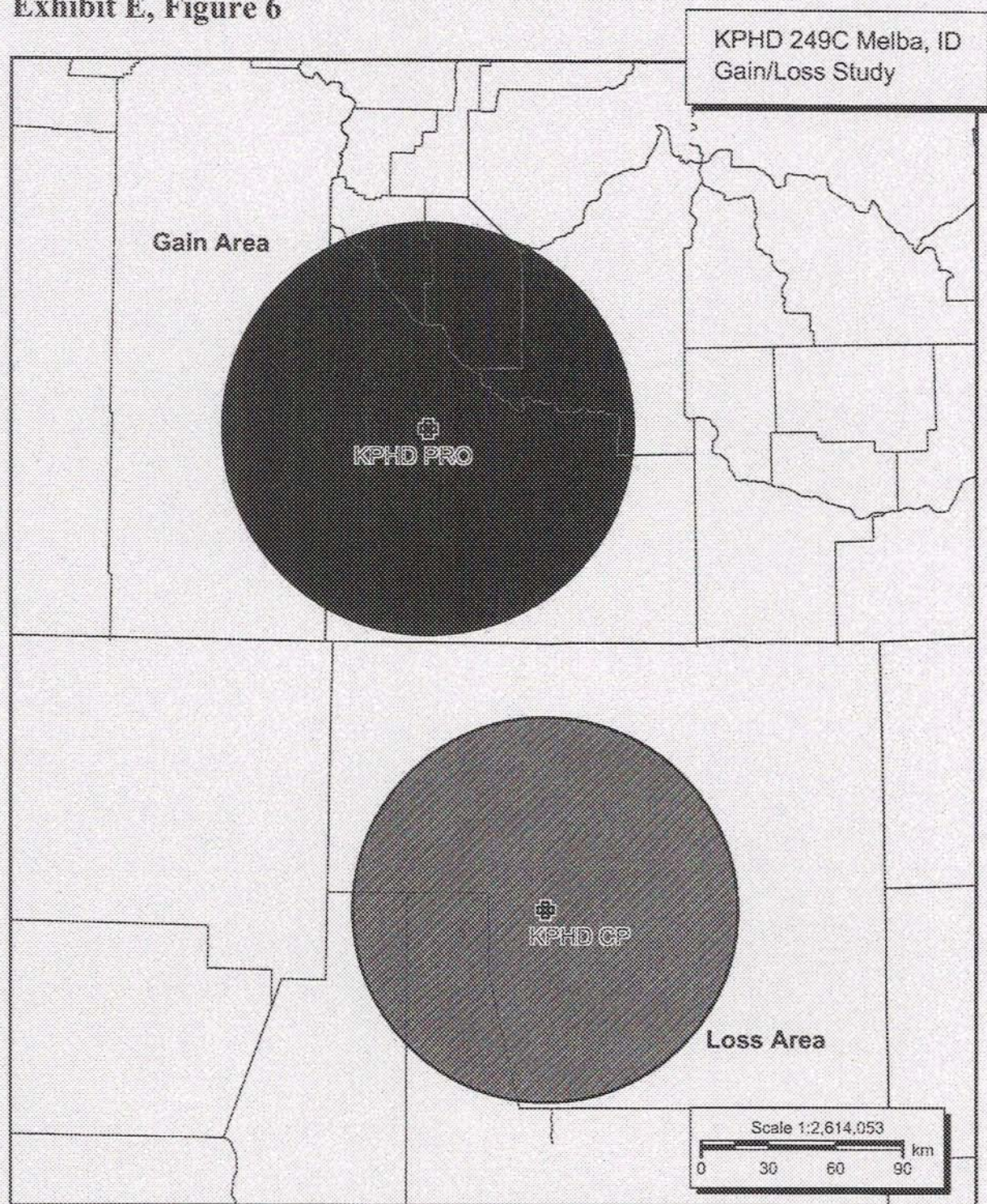
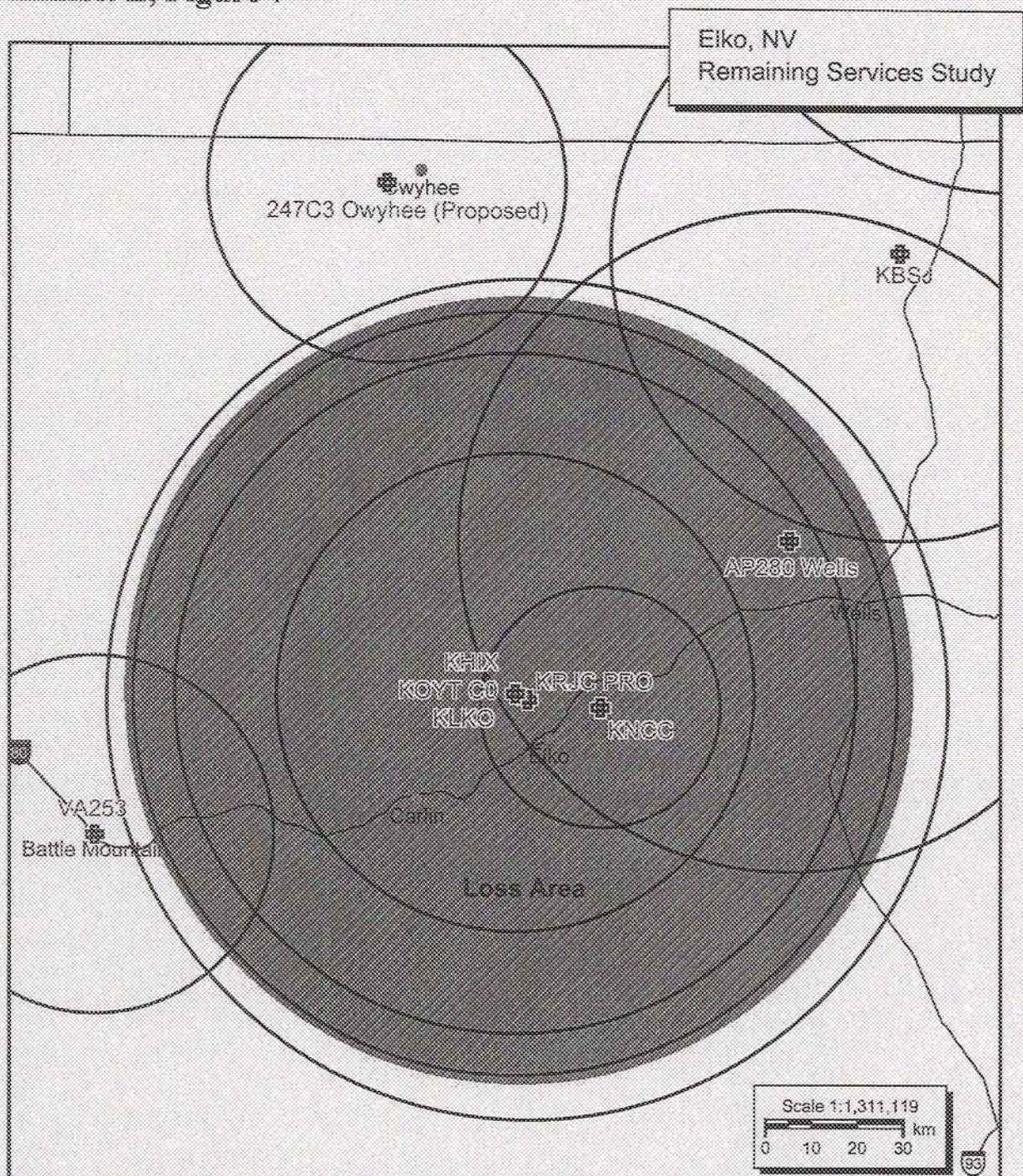


Exhibit E, Figure 6



Gain Area Population:	422,953
Loss Area Population:	37,985
Sq. km. in Gain Area:	26,478
Sq. km. in Loss Area:	23,267
Net Population Gain:	384,968
Net Sq. km. Gain:	3,211

Exhibit E, Figure 7



Elko, NV
 Remaining Services:
 KRJC, KHIX, KOYT, KLKO, KNCC, 280C1 Wells, KBSJ,
 VA253 Battle Mountain, 247C3 Owyhee (proposed)

In order to not create white area, KRJC instantly proposes upgrading from C1 to C. Therefore, no white or grey area is created.

Exhibit E, Figure 8

KRJC 237C Elko, NV Allocation Study

REFERENCE		DISPLAY DATES
40 54 35 N	CLASS = C	DATA 05-18-06
115 49 05 W	Current Spacings	SEARCH 05-18-06
----- Channel 237 - 95.3 MHz -----		

Call	Channel	Location		Dist	Azi	FCC	Margin
KRJC	LIC 237C1	Elko	NV	0.00	0.0	270.0	-270.00
Of No Concern:							
Licensed facility of KRJC before							
proposed modification.							
KECHFM	CP 237C0	Sun Valley	ID	325.48	20.6	281.0	44.48
